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**Sent:** Saturday, December 30, 2006 10:05 AM  
**To:** MLPACComments@resources.ca.gov  
**Cc:** hALIBUTBILL@msn.com  
**Subject:** MLPACComments: MLPA CEQA Comments

From Bill James 1038 5th street #3 Crescent City, California 95531 707-465-5347. Regarding Environmental Impacts The impacts of Fishing Displacement and the resulting Fishing Congestion are in no way being estimated nearly as severe as the environmental impacts will actually be. I speak as a fishermen who has fished in the Avila- Morro Bay region consistently from 1988- 2003 for the Nearshore Finfish Species and California Halibut. Fishermen will be displaced from the higher relief- more productive reefs to lower relief - less productive reefs in the area from Pt Purisma to Piedras Blancas. The resulting shift of effort will definitely increase the catch ( bycatch) of Canary Rockfish which is listed as a Federal Overfished species. This is against Federal Law ( Magnuson Stevens Conservation Act). Canary Rockfish in the Avila Morro Bay area are presently inhabiting the lower relief rocks- mud interface areas in waters greater than 10 fathoms (approx. 20 meters)- to water exceeding 100 fathoms. Fishermen that used to catch their limits of large fish in 3 hours in areas that will be closed off due to the Preferred alternative MPA network being put into place will be forced to fish in less productive waters with smaller fish in their limit. This will also cause excessive Bycatch of other rockfish ( Nearshore -Shelf species) as fishermen try to catch larger fish that they used to catch. In waters over 20 fathoms (120 ft) there is a high mortality among rockfish with swim bladders. Increased bycatch is also against provisions in the Federal Sustainable Fisheries Act of 1996. Even in the CEQA analysis there is a minimum 5 year period before any presumed spillover into fisher areas will occur. Canary Rockfish will be in the Overfished Category for at least that minimum period ( five years) there could be a violation of Federal Law for that period. I would be happy to discuss this further. Bill James 707-465 5347. PS a more detailed explanation will be prepared in January as the Dec 31 deadline is during the Holidays.